

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18 C 864

This Document Relates to All Cases

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**MOTION FOR LEAVE TO FILE THE DECLARATION OF BRIAN MAAS IN  
CONNECTION WITH THE CASE MANAGEMENT SCHEDULE**

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Plaintiff Bob Baker Volkswagen, through its attorneys, hereby respectfully requests leave to file the Declaration of Brian Maas, President of the California New Car Dealers Association (“Declaration”) attached hereto as Exhibit 1, in connection with the case management schedule presented in the Parties’ Joint Status Report (Doc. No. 36). In support of its Motion, Plaintiff states the following:

1. Mr. Maas’s declaration is relevant to the case management schedule. Mr. Maas represents many of the absent class members in a professional capacity, and his declaration explains automobile dealers’ interests with respect to the case management schedule in this litigation.

2. During the meet-and-confer process on the Joint Status Report, all counsel of record in this litigation agreed that any party could seek to file additional documents by motion for leave of court.

3. Because Mr. Maas is currently in Europe on vacation, we were unable to obtain his signature on his declaration until today, March 10, 2018.

Dated: March 10, 2018

Respectfully submitted,

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